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*Counsel for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

## SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

20 Individual and Representative Plaintiffs,  
21 v.  
22 META PLATFORMS, INC., a Delaware  
corporation;  
23 Defendant.

Case No. 3:23-cv-03417-VC

## **STIPULATION AND [PROPOSED] ORDER RESCHEDULE**

Pursuant to the Court's order dated October 4, 2024 (ECF No. 211) and Civ. L.R. 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz and Lysa Terkeurst ("Plaintiffs"); and Defendant Meta Platforms, Inc. ("Defendant," together with Plaintiffs, "Parties") by and through their respective counsel stipulate to the following:

WHEREAS, on October 4, 2024, the Court set a new fact discovery deadline of December 13, 2024, and a hearing on dispositive motions with respect to the named Plaintiffs' claims for May 1, 2025;

WHEREAS, the Court ordered the Parties to meet and confer and file a stipulation as to surrounding dates;

WHEREAS the Parties met and conferred and agreed upon the following deadlines;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Defendant, as represented by their undersigned counsel, the following schedule is hereby agreed to and proposed to the Court:

Case Event	Date
Meet and Confer re: Existing Written Discovery	October 16, 2024
Serve Additional Written Discovery Requests	October 18, 2024
Exchange Supplemental Initial Disclosures	October 21, 2024
Letter Briefs re: Existing Written Discovery	October 23, 2024
Close of Fact Discovery	December 13, 2024 (Set by the Court)
Opening Expert Reports Due	January 10, 2025
Rebuttal Expert Reports Due	February 3, 2025

1	Close of Expert Discovery	February 26, 2025
2	Opening Summary Judgment and <i>Daubert</i> Briefs Due	March 7, 2025
3	Oppositions to Summary Judgment and <i>Daubert</i> Briefs Due	April 3, 2025
4	Replies in Support of Summary Judgment and <i>Daubert</i> Briefs Due	April 17, 2025
5	Hearing on Summary Judgment Motions	May 1, 2025 (Set by the Court)

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1 Dated: October 11, 2024  
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3 By: /s/ Kathleen R. Hartnett

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Respectfully Submitted,

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25 *Counsel for Individual and Representative*  
26 *Plaintiffs and the Proposed Class*

1                   **PROPOSED ORDER**  
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Pursuant to stipulation of the Parties, **IT IS SO ORDERED.**  
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DATED: October 24, 2024

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HON. VINCE CHHABRIA  
United States District Judge